

Blumberg & Wolk, LLC

158 Delaware Street
P.O. Box 68
Woodbury, NJ 08096
(856) 848-7472

Counsel for Defendants Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, Kimberly Yvette Smith, M.D., a/k/a Kimberly Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Richard C. DiVerniero, M.D., and Richard Strauss, M.D.

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE: NEW ENGLAND
COMPOUNDING PHARMACY, INC.
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

All New Jersey Cases

MDL No. 2419

Docket No. 1:13-md-2419 (RWZ)

**PROPOSED ORDER EXTENDING PREMIER ORTHOPAEDIC AND SPORTS
MEDICINE ASSOCIATES OF SOUTHERN NEW JERSEY, LLC, ET. AL's DEADLINE
FOR COMMON-ISSUE FACT DISCOVERY TO JUNE 1, 2016**

Defendants Premier Orthopaedic and Sports Medicine Associates of Southern New Jersey, LLC, trading as Premier Orthopaedic Associates, Premier Orthopaedic Associates Surgical Center, LLC, Kimberly Yvette Smith, M.D., a/k/a Kimberly Yvette Smith-Martin, M.D., Thomas Dwyer, M.D., Rhaul Shah, M.D., John Catalano, M.D., Richard C. DiVerniero, M.D., and Richard Strauss, M.D. (Hereinafter "The Premier Defendants" or "Premier"), having agreed with the Plaintiffs'

Steering Committee (“PSC”), to the extension of common-issue fact discovery to June 1, 2016 for the reasons included in the foregoing Motion:

IT IS HEREBY ORDERED that the common-issue fact discovery deadline with respect to the Premier Defendants will be extended to June 1, 2016.

Dated: _____

Hon. Jennifer C. Boal
U.S. District Court Magistrate Judge

Respectfully submitted,

Blumberg & Wolk, LLC

By: /s/ Christopher M. Wolk, Esq.

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*Counsel for Defendants Premier
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M.D.*

CERTIFICATE OF SERVICE

I certify that in submitting this *MOTION*, I caused a copy of the above to be filed electronically via the Court's electronic filing system. Those attorneys who are registered with the Court's electronic filing system may access these filings through the Court's System, and notice of these filings will be sent to these parties by operation of the Court's electronic filing system.

Dated: March 4, 2016

/s/ Christopher M. Wolk
Christopher M. Wolk, Esq.

